

# **EXHIBIT A**

# **Updated Exhibit A**

## **Updated Materials Considered**

### **Deposition Transcripts**

- Deposition Transcript and Errata of Michael Amiet
- Deposition Transcript and Errata of Wendy Barnes (Express Scripts)
- Deposition Transcript and Errata of Brian Correia (Caremark)
- Deposition Transcript and Errata of Cade Erlund
- Deposition Transcript and Errata of David Halter (MedImpact)
- Deposition Transcript and Errata of Lynette Hilton
- Deposition Transcript and Errata of James Johnson (Optum)
- Deposition Transcript and Errata of Mitch Kempker (MedTrak)
- Deposition Transcript and Errata of Christy Piti (Sav-Rx)
- Deposition Transcript, Errata, and Exhibits of Kenneth Schafermeyer
- Deposition Transcript and Errata of David Schroff (LDI)
- Deposition Transcript and Errata of Scott Schuler

### **Deposition Transcripts from Other Cases**

- Deposition Transcript of Amber D. Compton, *Corcoran v. CVS Pharmacy, Inc.*, No. 3:15-CV-03504-YGR (N.D. Cal.)
- Deposition Transcript of John Martin Lavin, *Corcoran v. CVS Pharmacy, Inc.*, No. 3:15-CV-03504-YGR (N.D. Cal.)
- Deposition Transcript of Michael D. Reichardt, *Corcoran v. CVS Pharmacy, Inc.*, No. 3:15-CV-03504-YGR (N.D. Cal.)
- Deposition Transcript of William John Barre, *Corcoran v. CVS Pharmacy, Inc.*, No. 3:15-CV-03504-YGR (N.D. Cal.)
- Deposition Transcript of William Strein, *Corcoran v. CVS Pharmacy, Inc.*, No. 3:15-CV-03504-YGR (N.D. Cal.)

### **Declarations**

- Declaration of Bill McLaughlin of Express Scripts, Inc. (Oct. 22, 2020)
- Declaration of Henry Thompson of Walgreen Co. (Mar. 15, 2023)

### **Declarations from Other Cases**

- Declaration of Amber Compton (Nov. 21, 2016), *Corcoran v. CVS Pharmacy, Inc.*, No. 3:15-CV-03504-YGR (N.D. Cal.)
- Declaration of Amber Compton (May 14, 2018), *Schutte v. SUPERVALU INC.*, No. 11-CV-03290 (C.D. Ill.)
- Declaration of Brian Swett (Apr. 10, 2018), *Schutte v. SUPERVALU INC.*, No. 11-CV-03290 (C.D. Ill.)
- Declaration of Brian Swett (Jan. 23, 2019), *Proctor v. Safeway Inc.*, No. 3:11-CV-03406 (C.D. Ill.)

- Declaration of Franceen Spadaccino, RPh. (Nov. 18, 2016), *Corcoran v. CVS Pharmacy, Inc.*, No. 3:15-CV-03504-YGR (N.D. Cal.)
- Declaration of G. William Strein (Nov. 18, 2016), *Corcoran v. CVS Pharmacy, Inc.*, No. 3:15-CV-03504-YGR (N.D. Cal.)
- Declaration of John M. Lavin (Nov. 18, 2016), *Corcoran v. CVS Pharmacy, Inc.*, No. 3:15-CV-03504-YGR (N.D. Cal.)
- Declaration of Joseph C. Zavalishin (Feb. 22, 2017), *Corcoran v. CVS Pharmacy, Inc.*, No. 3:15-CV-03504-YGR (N.D. Cal.)
- Declaration of Michael D. Reichardt (Nov. 20, 2016), *Corcoran v. CVS Pharmacy, Inc.*, No. 3:15-CV-03504-YGR (N.D. Cal.)
- Declaration of Michael Viirre (Apr. 2, 2018), *Schutte v. SUPERVALU INC.*, No. 11-CV-03290 (C.D. Ill.)
- Declaration of Robert Burge (Apr. 2, 2018), *Schutte v. SUPERVALU INC.*, No. 11-CV-03290 (C.D. Ill.)

### **Walgreens-PBM Agreements**

- Walgreens-Caremark Agreement (Jan. 3, 2001) Walg\_Forth\_00320833 to Walg\_Forth\_00320851
- Walgreens-Caremark Agreement (Jan. 1, 2016) Walg\_Forth\_00051697 to Walg\_Forth\_00051712
- Walgreens-Caremark Agreement (Jan. 1, 2018) Walg\_Forth\_00053352 to Walg\_Forth\_00053557
- Walgreens-Caremark 2012 FEP Addendum Walg\_Forth\_00055262 to Walg\_Forth\_00055264
- Walgreens-Caremark 2015 FEP Addendum Walg\_Forth\_00101217 to Walg\_Forth\_00101220
- Walgreens-Caremark Washington Provider Agreement (Dec. 20, 2012) Walg\_Forth\_00055495 to Walg\_Forth\_00055506
- Walgreens-Catalyst Agreement, (Apr. 1, 2010) Walg\_Forth\_00055610 to Walg\_Forth\_00055652
- Walgreens-Catalyst Agreement (Mar. 8, 2011) Walg\_Forth\_00050076 to Walg\_Forth\_00050127
- Walgreens-Catamaran Letter Agreement (Mar. 1, 2014) Walg\_Forth\_00051380\_R to Walg\_Forth\_00051438\_R
- Walgreens-Express Scripts Agreement (Jan. 1, 2009) Walg\_Forth\_00193196 to Walg\_Forth\_00193229
- Walgreens-Express Scripts Exhibit A-1030 Walg\_Forth\_00160443 to Walg\_Forth\_00160446
- Walgreens-Express Scripts Exhibit A-1030 Walg\_Forth\_00160447 to Walg\_Forth\_00160449
- Walgreens-Express Scripts Exhibit A-1040 Walg\_Forth\_00175516 to Walg\_Forth\_00175519
- Walgreens-Express Scripts Agreement (July 19, 2012) Walg\_Forth\_00095271 to Walg\_Forth\_00095352

- Walgreens-Express Scripts Amendment (Oct. 1, 2017) Walg\_Forth\_00180170 to Walg\_Forth\_00180188
- Walgreens-LDI Agreement (Oct. 27, 2010) Walg\_Forth\_00142496 to Walg\_Forth\_00142523
- Walgreens-Medco Agreement (Apr. 8, 1994) Walg\_Forth\_00110245 to Walg\_Forth\_00110251
- Walgreens-MedImpact Agreement (Oct. 1, 2010) Walg\_Forth\_00321133 to Walg\_Forth\_00321179
- Walgreens-MedImpact Agreement (Jan. 1, 2016) Walg\_Forth\_00166036 to Walg\_Forth\_00166193
- Walgreens-MedTrak Agreement (July 1, 1999) Walg\_Forth\_00352849 to Walg\_Forth\_00352861
- Walgreens-MedTrak Agreement (June 1, 2011) Walg\_Forth\_00139947 to Walg\_Forth\_00139985
- Walgreens-Optum Agreement (Nov. 3, 2000) Walg\_Forth\_00170532 to Walg\_Forth\_00170547
- Walgreens-Optum Agreement (Jan. 1 2017) Walg\_Forth\_00053004 to Walg\_Forth\_00053169
- Walgreens-Restat Agreement (Apr. 1, 2011) Walg\_Forth\_00353309 to Walg\_Forth\_00353330
- Walgreens-Sav-Rx Agreement (July 1, 1999) Walg\_Forth\_00148167 to Walg\_Forth\_00148180
- Walgreens-Sav-Rx Agreement (August 1, 2010) Walg\_Forth\_00144213 to Walg\_Forth\_0014424
- Walgreens-SXC Agreement (Sept. 1, 2011) Walg\_Forth\_00055348 to Walg\_Forth\_00055388

#### **PBM-TPP Agreements**

- Caremark-IBEW Agreement (Jan. 1, 2008) IBEW\_0018829 to IBEW\_0018962
- Caremark-IBEW Plan Information, EHPC 00272 to EHPC 00282
- Caremark-IBEW Agreement (Jan. 1, 2019) EHPC 00152 to EHPC 00228
- Sav-Rx-IBEW Agreement (June 1, 2006) IBEW\_0017640 to IBEW\_0017685
- Medco-IUOE Agreement (Feb. 15, 2008) LOCAL295\_0025904 to LOCAL295\_0025922
- Medco-IUOE Amendment (Feb. 15, 2011) LOCAL295\_0025923 to LOCAL295\_0025935
- Express Scripts-IUOE Agreement (June 3, 2014) LOCAL295\_0001006 to LOCAL295\_0001039
- Express Scripts-IUOE Agreement (Aug. 19, 2016) LOCAL295\_0000138 to LOCAL295\_0000174
- LDI-Steamfitters Agreement (Jan. 1, 2014) LOCAL439\_0001815 to LOCAL439\_0001886
- LDI-Steamfitters Amendment (May 1, 2018) LOCAL439\_0000345 to LOCAL439\_0000348
- LDI-Steamfitters Agreement (Jan. 1, 2019) LOCAL439\_0002146 to LOCAL439\_0002163

- MedTrak Steamfitters (Jan. 1, 2008) LOCAL439\_0001792 to LOCAL439\_0001805

### **PBM Manuals**

- Caremark Manual, CAREMARK\_FORTH-002519 to CAREMARK\_FORTH-002864
- Caremark Manual, Walg\_Forth\_00169301 to Walg\_Forth\_00169610
- Caremark Manual, CAREMARK\_FORTH-001969 to CAREMARK\_FORTH-002210
- Caremark Manual, CAREMARK\_FORTH-003045 to CAREMARK\_FORTH-003269
- Caremark Manual, CAREMARK\_FORTH-002869 to CAREMARK\_FORTH-003044
- Caremark Manual, CAREMARK\_FORTH-001807 to CAREMARK\_FORTH-001968
- Caremark Manual, CAREMARK\_FORTH-000193 to CAREMARK\_FORTH-000248
- Caremark Manual (Excerpt), Walg\_Forth\_Jacobs01672 to Walg\_Forth\_Jacobs01674
- CatalystRx Manual, ORx\_Worth\_000178 to ORx\_Worth\_000244
- Catamaran Manual, ORx\_Worth\_001060 to ORx\_Worth\_001191
- Catamaran Manual, ORx\_Worth\_000399 to ORx\_Worth\_000451
- Express Scripts Manual, ESI-0000323 to ESI-0000581
- Express Scripts Manual, ESI-0000127 to ESI-0000322
- Express Scripts Manual, IBEW\_0020292 to IBEW\_0020384
- Express Scripts Manual, Schafermeyer\_0000074 to Schafermeyer\_0000202
- LDI Manual, CAST000530 to CAST000591
- Medco Manual, ESI-0001178 to ESI-0001319
- Medco Manual, IBEW\_0020799 to IBEW\_0020903
- MedImpact Manual, IBEW\_0020385 to IBEW\_0020798
- MedImpact Manual, MI-F\_00002160 to MI-F\_00002434
- MedImpact Manual, MI-F\_00001883 to MI-F\_00002159
- MedImpact Manual, MI-F\_00001250 to MI-F\_00001425
- MedImpact Manual, MI-F\_00001426 to MI-F\_00001600
- MedImpact Manual, MI-F\_00001156 to MI-F\_00001249
- MedTrak Manual, MedTrak-28 to MedTrak-59
- MedTrak Manual, IBEW\_0020904 to IBEW\_0020922
- Optum Manual, ORx\_Worth\_003697 to ORx\_Worth\_003849
- Optum Manual, ORx\_Worth\_003379 to ORx\_Worth\_003539
- Optum Manual, ORx\_Worth\_003061 to ORx\_Worth\_003218
- Optum Manual, ORx\_Worth\_002609 to ORx\_Worth\_002752
- Optum Manual, ORx\_Worth\_001910 to ORx\_Worth\_002044
- Optum Manual, ORx\_Worth\_001430 to ORx\_Worth\_001500
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### **Laws, Regulations, & Guidance**

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- 70 Fed. Reg. 4194, 4245 (Jan. 28, 2005)
- 70 Fed. Reg. 4194, 4236 (Jan. 28, 2005)
- 66 Fed. Reg. 37564, 37567 (July 18, 2001)
- 67 Fed. Reg. 56618, 56636 (Sept. 4, 2002)

- 68 Fed. Reg. 69840, 69918 (Dec. 15, 2003)
- Medicare Prescription Drug, Improvement, and Modernization Act of 2003, Pub. L. No. 108-173, 121 Stat. 2492, <https://www.congress.gov/bill/108th-congress/house-bill/1/text>

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